

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. _____ : DATE FILED: _____

JESSE ALLEN : **VIOLATIONS:**
: **18 U.S.C. § 1951(a) (robbery which**
: **interferes with interstate commerce**
: **- 3 counts)**
: **18 U.S.C. § 924(c) (using and carrying a**
: **firearm during a crime of violence - 3**
: **counts)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Ana's Grocery Store, located at 1262 S. 49th Street in Philadelphia, Pennsylvania, was a grocery and convenience store, which affected interstate commerce, and which sold, among other things, beverages, dairy products, candy, and health and beauty supplies, that traveled in interstate commerce.

2. On or about July 20, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JESSE ALLEN

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant ALLEN unlawfully took and obtained approximately \$300 cash from an employee of Ana's Grocery Store and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate

and future to the employee, that is, by pointing a firearm at, demanding money from, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

JESSE ALLEN

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
robbery which interferes with interstate commerce, in violation of Title 18, United States Code,
Section 1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Estrella's Grocery Store, located at 1012 S. 52nd Street in Philadelphia, Pennsylvania, was a grocery and convenience store, which affected interstate commerce, and which sold, among other things, beverages, dairy products, candy, and health and beauty supplies that traveled in interstate commerce.

2. On or about August 13, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JESSE ALLEN

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant ALLEN unlawfully took and obtained cash from an employee of Estrella's Grocery Store and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JESSE ALLEN

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

At all times material to this indictment:

1. Kim's JKP Food Market, located at 4837 Woodland Avenue in Philadelphia, Pennsylvania, was a grocery and convenience store, which affected interstate commerce, and which sold beverages, candy and food products that traveled in interstate commerce.

2. On or August 13, 2009 in Philadelphia, in the Eastern District of Pennsylvania, defendant

JESSE ALLEN

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant ALLEN unlawfully took and obtained less than \$100 cash from employees of Kim's JKP Food Market and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees, that is, by pointing a firearm at, demanding money from, and threatening the employees.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JESSE ALLEN

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Section 924(c).

TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney